

EXHIBIT T

THIRD RECORDING (234) HIND OMAR & CHERISE FROST
TRANSCRIBED BY: CAROLYN GRITTINI, CSR-3381

MS. OMAR: How are you?

MS. FROST: I'm okay. Just putting it out there now, please forgive my low energy, I'm a little under the weather.

MS. OMAR: I completely understand. My toddler did the same thing to me. So I totally get it.

MS. FROST: Gotta love it, right?

MS. OMAR: Yeah, it's the price of doing business.

MS. FROST: Yep, that's right. So I just wanted to touch bases with you because I've been doing a whole lot of back and forth communication between the law school and our legal counsel and ABA and I'm just trying to make sure I understand everything and what we're able to offer. And I know your deadline was coming, so I apologize for taking so long.

MS. OMAR: I appreciate your due diligence.

MS. FROST: It's okay. I just needed to make sure that I was understanding fully what our options are and everything.

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<p style="text-align: right;">Page 2</p> <p>1 program is designed, so we're not able to offer a 2 fully remote option for you. 3 MS. OMAR: Okay. 4 MS. FROST: And so what I would like to do, and I know 5 you're in decision mode, so if you should decide that 6 you still want to attend Wayne State with that in 7 mind, I want to figure out alternate ways to offer 8 accommodations to make sure that your experience is 9 one that works with your needs. 10 MS. OMAR: What did the ABA say? 11 MS. FROST: So they said they cannot give direct 12 advice about specific situations, but that they 13 would -- here, let me go back and reference it, 14 because they, actually I guess as a layperson, weren't 15 really interested in talking directly to me. 16 MS. OMAR: I'm also recording this, by the way, just 17 for my records, is that okay? 18 MS. FROST: Yeah, yeah. You have permission. Thanks 19 for letting me know. 20 MS. OMAR: I appreciate that. 21 MS. FROST: Where are we at? Oh, so actually -- well, 22 let me look back at that. His response was a little 23 generic. Because they wouldn't give me more 24 information, I referred them to talk to our law school 25 deans and such and our legal counsel and things were</p>	<p style="text-align: right;">Page 4</p> <p>1 your conversations, but just -- 2 MS. FROST: No, it's okay. It's okay. So they're 3 saying it fundamentally alters the course of study. 4 So the course -- their classes and program is not 5 designed to be online. They use the Socratic method, 6 they have this in-person, interactive style of 7 delivery in terms of like the teaching style. And so 8 it fundamentally alters it to have remote students, or 9 a student participate remotely I should say. 10 MS. OMAR: Alters it for who, though? 11 MS. FROST: I think the learning outcomes and 12 experience that they want students to have would be 13 altered if that student is not participating in 14 person. 15 MS. OMAR: By who, though? I feel like the 16 conversation is like -- we're having two different 17 conversations. Like, they're having a conversation 18 that's for like -- I'm not even -- I'm not arguing 19 with you. I know that you are just relaying 20 information. I swear, I'm not trying to be 21 argumentative. But from my perspective, it feels like 22 we're having two separate conversations. Where like 23 one is them trying to kind of keep up a status quo or 24 like keep a generic, like generalized student, and 25 that's not the conversation that I'm having. Like I'm</p>
<p style="text-align: right;">Page 3</p> <p>1 involved as well in that discussion, so the response 2 to me was not very detailed. I don't have their 3 direct responses. They spoke with -- our law 4 School folks consulted with various peers around the 5 nation as well as like with the laws that dealt with 6 ABA and such, so I don't have direct response, I'm 7 sorry, that wasn't given to me. I had to refer them 8 to the law school deans. 9 MS. OMAR: So am I able to -- just in the policy it 10 says that if they were to deny me accommodations, that 11 they would formally have to write that they denied me 12 and why. Is that something I can request? 13 MS. FROST: Yeah, I can for -- you mean from the law 14 school? 15 MS. OMAR: Yes. 16 MS. FROST: Okay. Yeah, I mean, I can ask and I 17 suppose you could also ask for a more detailed 18 response in writing. So that's something I will talk 19 with Dean Welch about it. And I can ask that through 20 her. 21 MS. OMAR: So was it -- so for me, it seems like it's 22 in plain English, right? Like it's in the policy. 23 And so for them, did they just interpret it 24 differently? Did they use like academic freedom? 25 Like what was the pushback -- I don't want to pry into</p>	<p style="text-align: right;">Page 5</p> <p>1 having the conversation of like what works for me. 2 Like what works better for me to be able to relay -- 3 like to relay the information. What works better for 4 me to learn -- like I'm having an individualized 5 conversation and they're having a generalized 6 conversation. I feel like we're having two different 7 conversations. Does that make sense? 8 MS. FROST: Yeah, I get what you mean by that. I 9 mean, like, their style of delivering the information 10 in the classes, their teaching methodology that they 11 as an entire entity follow just doesn't fit the mode 12 of remote study. And so we want to look at other 13 ways. I think you mentioned your assistive 14 technology, for example -- 15 MS. OMAR: Except for -- 16 MS. FROST: Is that something we can get for you here? 17 MS. OMAR: Except for when they take snow days, and 18 when they do -- 19 MS. FROST: I'm sorry can you repeat that one more 20 time? 21 MS. OMAR: Except for when they do take snow days and 22 when they do go remote? 23 MS. FROST: I don't know why -- it might be my ears, 24 but can you say that one more time? 25 MS. OMAR: I'm saying it doesn't fit the mold for</p>

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<p style="text-align: right;">Page 6</p> <p>1 remote learning except for when they choose to go 2 remote? 3 MS. FROST: Oh, well, that was because of the 4 pandemic, as we know, and that was -- is that what 5 you're referring to? 6 MS. OMAR: No, not even. Exigent circumstances, so 7 like weather. They took a snow day like two weeks 8 ago. 9 MS. FROST: Oh. Yeah, I guess I don't know how they 10 did that. Like I know that the university has decided 11 that for snow days, there will be remote study. I 12 don't know if professors have the discretion to like 13 hold class remotely or not. I don't know if they did, 14 you know, if they chose to say okay, this will be a 15 class day or if they did find ways to do remote 16 instruction. I'm not really certain. Do you know 17 what I mean? Like I'm not sure how faculty are 18 handling those switch to remote days. 19 MS. OMAR: Okay. 20 MS. FROST: But yeah, you're right, the university did 21 pivot to remote because of the weather a couple weeks 22 back. 23 MS. OMAR: And then, who exactly was the one saying -- 24 it was it just Dean Welch or were there others? 25 MS. FROST: Yeah, Dean Welch has -- she consulted with</p>	<p style="text-align: right;">Page 8</p> <p>1 highlight, work through your information, your reading 2 material and that sort of thing. You had mentioned 3 assistive technology, which again is what I'm saying, 4 is there a way we can find out what assistive 5 technology you use, so maybe that's something we can 6 get here at the law school so that you wouldn't have 7 to transport it. You had mentioned having to 8 transport being a challenge, so that's one way we can 9 get around that and offer that technology for you here 10 at Wayne. 11 And then, I'm sorry, I'm trying to skim through -- 12 MS. OMAR: No, it's okay, take your time. 13 MS. FROST: Thank you. And then you had mentioned 14 wanting control over your work space to mitigate 15 anxiety. And so I was going to ask a bit more about 16 that. Like how have you managed that in the past with 17 some of your in-person studies, so that I can get 18 thoughts on how we could support that? 19 MS. OMAR: I didn't have these diagnoses during my 20 undergrad. 21 MS. FROST: Oh, I see. Okay. 22 MS. OMAR: Yeah. 23 MS. FROST: Okay. So you did not have to find -- 24 MS. OMAR: Accommodate them, no 25 MS. FROST: Okay, I gotcha. Okay. And then I</p>
<p style="text-align: right;">Page 7</p> <p>1 the associate Dean. So the deans, basically, the 2 deans of the law school 3 MS. OMAR: Okay. And did they offer any alternative 4 to the request, or was it just a flat out like no? 5 MS. FROST: No, that's not -- it's not a flat out no. 6 That's kind of what I was hoping to get to, like what 7 other ways we can accommodate you. We don't want to 8 be in the business of saying flat out nos. We want to 9 find out alternate ways to support. I know you've 10 given us the -- I'm pulling your document back up 11 where you explained your needs. 12 So it's definitely not a flat out no. It's more like 13 that specific mode of instruction alters the 14 fundamental course of study, so we want to look at 15 what other ways can we support. Like I know there's a 16 bunch of other accommodations on there that were to me 17 easier to figure out how to do. We can figure out a 18 plan for cold calling. We can figure out a plan for 19 recording your lectures and so forth and so on. The 20 distance education one was I think the stickiest one, 21 and I want us to go through like what ways we can 22 offer support for the specific things you noted. So 23 like, when I look at the information provided, like if 24 I had to identify the specific areas, like you had 25 mentioned that it takes you longer to study and</p>	<p style="text-align: right;">Page 9</p> <p>1 remember you telling me that you were connected 2 already with BSBP, the Bureau of Services For Blind 3 Persons. 4 MS. OMAR: Uh-hum. 5 MS. FROST: Have you had them ever engage with you in 6 orienting you to spaces and things like that to make 7 it more comfortable for you? 8 MS. OMAR: Not so much, no, not so much. 9 MS. FROST: Okay. I know that is something that they 10 offer, so that was a thought for how to help with 11 getting comfortable navigating spaces, classrooms, 12 bathrooms and things that you had mentioned in your 13 document to help support getting comfortable here on 14 campus. And then, again, if we didn't have the 15 assistive technology that could support your needs, we 16 were hoping that would be -- 17 MS. OMAR: Did they see any other issue with any of my 18 other accommodations? 19 MS. FROST: The only other accommodation, which I 20 believe had already spoken with Sadfah about, the 21 research assistant, you know, we don't typically do 22 the higher of them, you know, assistants for people. 23 That's like, so when a student needs, for example, a 24 personal care attendant, that's the student's 25 responsibility to hire and bring someone on. And I</p>

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<p style="text-align: right;">Page 10</p> <p>1 think when you and I spoke last, we talked about the 2 fact that BSBP actually has in the past paid for a 3 tutor for a student who was going to Wayne State. And 4 that I could see operating in a similar capacity as 5 what you had written there. But other than -- 6 MS. OMAR: But what I'm asking for is academic. 7 MS. FROST: Say it one more time. 8 MS. OMAR: Like the service that I'm asking for is an 9 academic service. So like a research assistant from a 10 law school or the law school that's really specific to 11 like exactly what I'm learning. So it's not just like 12 tutoring in algebra, like it's more so like, help me 13 with the citations in a law school program. Like help 14 me with the extractions of text from specific cases to 15 put into my publications. So that's more so what I 16 was looking for, not so much like a personal helper or 17 a tutor. It was more so like research based more than 18 it was personal. 19 MS. FROST: Okay. So I think -- even though I know 20 I've called them a tutor, I was thinking that whatever 21 qualifications they have, it would be something we 22 assess through, sort of, say, interviewing or talking 23 with people. I don't know if the law school has TA's, 24 for example. I know other graduate programs might 25 have a graduate teaching assistant. So, for example,</p>	<p style="text-align: right;">Page 12</p> <p>1 the resources. We don't particularly have a state 2 fund that we can dip into to pay a tutor. 3 MS. OMAR: Yeah 4 MS. FROST: So we don't have paid note takers or 5 anything like that here through our office, because we 6 just don't have the funds for that sort of thing. So 7 I don't know that I would say the law school is 8 pushing back on that. That's the only thing we 9 actually talked about in such depth was mostly the 10 distant education piece, and then, because that's the 11 only one that they said was a fundamental alteration. 12 The rest of it is just to me about you and SDS kind 13 of, let's navigate how we bring this to fruition -- 14 MS. OMAR: Okay. 15 MS. FROST: --in a most reasonable way. So I don't 16 think they're pushing back on anything else, it's just 17 we have to talk about the fundamental alteration of 18 the distance education and find a sort of a work- 19 around for that. 20 MS. OMAR: Okay. And did they give you any more 21 expanding upon that of like how it alters or I can't 22 it alters or anything at all? Or was it just a 23 generalized, like, it just alters? 24 MS. FROST: Yeah. It's more like it just alters the 25 course of study. And what I know of it, I mean, from</p>
<p style="text-align: right;">Page 11</p> <p>1 if they have someone who kind of fits that category, 2 having them would -- if they have the time, I suppose, 3 and the capacity, to act as a person in that capacity, 4 they would know law -- 5 MS. OMAR: Exactly. 6 MS. FROST: -- citations. 7 MS. OMAR: Yeah. 8 MS. FROST: You know -- 9 MS. OMAR: Yeah. 10 Ms. Frost: So I guess I'm using the words tutor, the 11 word tutor, but I mean more like a person specific to 12 law -- familiar with law is what I mean. But then 13 paid through BSBP so -- 14 MS. OMAR: Got it 15 MS. FROST: So similar to how we hired that tutor for 16 the student, but of course, on the level of -- 17 MS. OMAR: It's so strange. Michigan hired one for me 18 from their department. Like it wasn't even like a -- 19 I get it, I understand. And BSBP I'm sure will be 20 more than happy to do it. But it's just strange that 21 they're pushing back on that because Michigan was so 22 willing to do it. 23 MS. FROST: Yeah, I don't think that they -- well, I 24 can speak for our department in terms of resources. 25 That's why we have to go outside to see if BSBP has</p>	<p style="text-align: right;">Page 13</p> <p>1 the conversations I had, what I deduced is that the 2 courses are not designed that way. So they don't have 3 any hybrid courses, for example. They don't have 4 anything that fits the mold of -- like I suppose, and 5 I've only taught classes that are very low level, sort 6 of Wayne experience, this is how you do college sort 7 of courses, so I don't have enough teaching experience 8 to say, but I'm making an assumption that teaching a 9 course online and the things that you assess, the ways 10 that you include interaction and that's a little 11 different than when you teach in person and really 12 engaging with students. I'm assuming because those 13 are such different teaching modalities, that's why 14 it's like, if they modify that, it alters what they're 15 teaching, like learning outcomes and some of their 16 lesson plans potentially. I know I'm (unintelligible) 17 when I say lesson plans, but the structure of the way 18 that they've designed their courses, doing the remote 19 course alters that. And so they're committed to a 20 specific teaching modality that they have found to 21 meet learning objectives that are necessary for, you 22 know, accreditation and such. And then eventually 23 being licensed. Right. They have it designed a 24 certain way. Going to the alternate version of that, 25 like a remote version of that, they feel alters too</p>

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<p style="text-align: right;">Page 14</p> <p>1 significantly their course design. So like that's</p> <p>2 my explanation of it based on what I understand.</p> <p>3 MS. OMAR: Okay. And getting that write-up from them</p> <p>4 with the denial, is that something that I should</p> <p>5 e-mail Dean Welch about or maybe cc you? Is that</p> <p>6 something that you want to reach out to her for?</p> <p>7 MS. FROST: Either way is fine to me. Obviously, I</p> <p>8 always encourage students to advocate for whatever</p> <p>9 they want to themselves. You know, you're welcome to</p> <p>10 speak on your behalf and I can also ask them. Because</p> <p>11 again, like I say, it's not a denial of complete</p> <p>12 accommodations. What we want to do is look at a</p> <p>13 different way to accommodate that specific request</p> <p>14 they feel alters the fundamental -- fundamentally</p> <p>15 alters, excuse me, their course of study.</p> <p>16 MS. OMAR: Okay.</p> <p>17 MS. FROST: What do you feel most comfortable with in</p> <p>18 terms of requesting a written statement?</p> <p>19 MS. OMAR: I can e-mail them for that, but I'll cc you</p> <p>20 on it.</p> <p>21 MS. FROST: Yeah.</p> <p>22 MS. OMAR: Can I set up another appointment with you</p> <p>23 maybe next week when you're back in the office? It's</p> <p>24 just a lot for me to take in, I just want to think on</p> <p>25 it a little bit.</p>	<p style="text-align: right;">Page 16</p> <p>1 MS. OMAR: Perfect.</p> <p>2 MS. FROST: Okay.</p> <p>3 MS. OMAR: Thank you.</p> <p>4 MS. FROST: You're welcome, Hind. And I'll talk with</p> <p>5 you on Monday.</p> <p>6 MS. OMAR: All right, sounds good, Dean -- Director.</p> <p>7 Thank you you're the best.</p> <p>8 MS. FROST: I hope you feel better too.</p> <p>9 MS. OMAR: Thank you so much. You as well.</p> <p>10 (Zoom disconnects).</p> <p>11 MALE VOICE: I'm not surprised.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 15</p> <p>1 MS. FROST: That's perfectly fine. Let me look at my</p> <p>2 calendar.</p> <p>3 MS. OMAR: Okay, perfect. I'm sorry, it's just a lot</p> <p>4 for me to process and not the outcome that I was</p> <p>5 anticipating, so I just want to take a little time to</p> <p>6 think.</p> <p>7 MS. FROST: And that's okay, I understand.</p> <p>8 MS. OMAR: Thank you.</p> <p>9 MS. FROST: So what days work best for you? I have a</p> <p>10 lot of availability on the 3rd and the 6th most</p> <p>11 availability, but I do different slots throughout the</p> <p>12 rest of the week two. So I can be -- I can look at</p> <p>13 other dates as well</p> <p>14 MS. OMAR: I can do the 3rd in the morning.</p> <p>15 MS. FROST: Okay.</p> <p>16 MS. OMAR: Or --</p> <p>17 MS. FROST: So I have either around the same time like</p> <p>18 around 9:30, ten. My morning is kind of clear, so</p> <p>19 eleven even.</p> <p>20 MS. OMAR: Yeah, let's do -- 9:30 works.</p> <p>21 MS. FROST: Okay.</p> <p>22 MS. OMAR: 9:30?</p> <p>23 MS. FROST: Not a problem</p> <p>24 MS. OMAR: Yeah, that works</p> <p>25 MS. FROST: So I'll send you another Zoom link.</p>	<p style="text-align: right;">Page 17</p> <p>1 CERTIFICATE OF NOTARY</p> <p>2 STATE OF MICHIGAN)</p> <p>3) SS</p> <p>4 COUNTY OF MACOMB)</p> <p>5</p> <p>6</p> <p>7 I, CAROLYN GRITTINI, certify that this</p> <p>8 recording was transcribed by me on the date</p> <p>9 hereinbefore set forth; that the foregoing recording</p> <p>10 was recorded by me stenographically and reduced to</p> <p>11 computer transcription; that this is a true, full and</p> <p>12 correct transcript of my stenographic notes so taken;</p> <p>13 and that I am not related to, nor of counsel to,</p> <p>14 either party nor interested in the event of this</p> <p>15 cause.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 <i>Carolyn Grittini</i></p> <p>21</p> <p>22 CAROLYN GRITTINI, CSR-3381</p> <p>23 Notary Public,</p> <p>24 Macomb County, Michigan.</p> <p>25 My Commission expires: July 15, 2024</p>